



September 26, 2011

VIA ECF

Hon. Tonianne J. Bongiovanni, U.S.M.J.
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: *Takeda Pharmaceutical Company Limited et al. v. Zydus Pharmaceuticals (USA), Inc. et al.*, Civ. Action No. 3:10-CV-01723-JAP-TJB

John E. Flaherty

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Dear Judge Bongiovanni:

We, along with our co-counsel Hogan Lovells US LLP, represent Plaintiffs in the above-referenced action. We write on behalf of both parties to propose deadlines for upcoming discovery activities and summary judgment motions.

The parties have met and conferred and agreed on the following dates:

Activity	Date
End of fact discovery	November 23, 2011
Opening expert reports	December 23, 2011
Responsive expert reports	January 27, 2012
Expert discovery closes	February 29, 2012
Opening summary judgment briefs	March 23, 2012
Opposition summary judgment briefs	April 13, 2012
Reply summary judgment briefs	May 4, 2012

If these proposed dates meet with your approval, we respectfully request that Your Honor "so order" these deadlines in this action.

Respectfully,

s/John E. Flaherty

John E. Flaherty

cc: Counsel of Record (via email)

BOSTON

HARTFORD

NEW YORK

NEWARK

PHILADELPHIA

STAMFORD

WILMINGTON

SO ORDERED on this ____ day of _____, 2011:

Hon. Tonianne J. Bongiovanni, U.S.M.J.